

EXHIBIT A

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**IN RE NEW ENGLAND COMPOUNDING)
PHARMACY, INC. PRODUCTS)
LIABILITY LITIGATION)**

THIS DOCUMENT RELATES TO:

All Suits Against the Saint Thomas Entities

**MDL No. 2419
Dkt. No 1:13-md-2419 (RWZ)**

Notice to Victory of 30(b)(6) Depositions

Defendants, Saint Thomas West Hospital f/k/a St. Thomas Hospital; Saint Thomas Health; and Saint Thomas Network (collectively the “Saint Thomas Entities”), pursuant to Federal Rule of Civil Procedure 30(b)(6), come now and give notice that the oral and videotaped depositions of Victory Heating & Air Conditioning Co., Inc. and Victory Mechanical Services, Inc. (collectively “Victory”), as organizations, will be taken on the topics detailed below. Victory shall identify the person(s) who will speak on its behalf on each topic at least seven (7) days before the deposition(s).

The deposition will be taken on June 9, 2015, beginning at 9:00 a.m. (EDT) and continuing until completed. The deposition will take place at the offices of Nutter, McClennon & Fish LLP, Seaport West, 155 Seaport Blvd., Boston, Massachusetts 02210. The deposition will be recorded by stenographical means and by video.

Pursuant to Federal Rule of Civil Procedure 30(b)(6), Victory's designee(s) shall be prepared to testify regarding the following subjects:

1. The products and services you provided at the NECC facility;
2. Any complaints regarding the products or services you provided at the NECC facility;
3. All tests, analysis, communications or representations relating to the air pressure at the NECC facility or any products or services you provided;
4. All training, manuals or documentation you provided regarding the operation, maintenance, settings or needs of the HVAC and related systems at the NECC facility;
5. The documents you produced in this MDL, whether to the PSC or in response to any party's request, whether formal or informal;
6. The identity of the persons providing products or services related to the NECC facility and their supervisors and managers;
7. The terms and conditions of the services you provided at the NECC facility;
8. Victory's responses to the Saint Thomas Entities' discovery requests, including without limitation the documents produced in response; and
9. Information known or available to Victory regarding the circumstances of the contamination of MPA at the NECC Facility, the outbreak of fungal meningitis across several states, and the closing of NECC and Ameridose; and
10. Documents produced by any party on the US Legal repository involving any Victory representative or employee.

Respectfully submitted,

/s/ Adam T. Schramek

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CERTIFICATE OF SERVICE

I certify that unless noted otherwise below, the foregoing was served by electronic mail on the 28th day of April, 2015.

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